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11 *Attorneys for Plaintiff Jeremy Stanfield  
and the Proposed Class*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

18 JEREMY STANFIELD, individually and on  
behalf of all others similarly situated,

20 Plaintiff

21 || VS.

22 || TAWKIFY, INC.,

## 23 Defendants.

**Case No. 3:20-cv-07000-WHA**

**PLAINTIFF'S RESPONSE TO DKT. 128**

Date: December 2, 2021  
Time: 8:00 a.m.  
Courtroom: 12  
Judge: Hon. William H. Alsup

1 Plaintiff Jeremy Stanfield (“Plaintiff”) responds to the Court’s Request for Further  
2 Information Re Ability to Pay (Dkt. 128) as follows:

3 **Response to Ability to Pay Questions:**

4 1. Plaintiff does not own any real estate.

5 2. Plaintiff makes payments on a 2014 Toyota Prius. The contract for the vehicle has [REDACTED]  
6 interest rate.

7 3. Plaintiff has not applied for any loans in the last three years except for financing his used  
8 car. The 2021 credit application for the vehicle states gross monthly income of [REDACTED]  
9 [REDACTED] As set forth in the Declaration of Jeremy Stanfield in  
10 Support of Plaintiff’s Opposition to Defendant Tawkify, Inc.’s Motion for Award of  
11 Attorneys’ Fees and Costs, Plaintiff’s monthly income [REDACTED]  
12 [REDACTED] (ECF No. 120-13, ¶ 8).

13 **Statement of Plaintiff’s Current Net Assets:**

14 [REDACTED]

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Dated: December 1, 2021

Respectfully submitted,

OLIVIER SCHREIBER & CHAO LLP

CONN LAW, PC

/s/ Elliot Conn

Elliot Conn

*Attorneys for Plaintiff*

*JEREMY STANFIELD*